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A D M I T T E D N Y

November 1, 2022

BY ECF

The Honorable LaShann DeArcy Hall United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Jordan, Jr. et al., 20 Cr. 305 (S-1) (LDH)

Your Honor:

On behalf of Karl Jordan, Jr., I write in response to the government's discovery motions dated October 19, 2022.

We join in co-defendant Ronald Washington's opposition at Doc. No. 118, and for the reasons stated in Mr. Washington's opposition the government's motions should be denied.

Nevertheless, we supply the following. We have no expert disclosures to make at this time.

Mr. Jordan also agrees to disclose any Rule 26.2 material in the defense's possession three days before any witness testifies with the understanding that the defense may update that disclosure on a rolling basis as more material is created.

Respectfully,

/s/Michael Hueston

cc: Counsel of Record